

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)	Chapter 13
)	
Roosevelt Morgan,)	No. 18-29896
)	
)	
)	
Debtor.)	Judge Timothy A Barnes

NOTICE OF MOTION

TO: SEE ATTACHED SERVICE LIST

You are hereby notified that on May 2, 2019, at 9:30 a.m., or as soon after as I may be heard, I will appear before the Honorable Timothy A. Barnes or any other Judge who may be presiding in her place and stead at the Dirksen Federal Building, 219 S. Dearborn, Room 744, Chicago, Illinois and I will then and there present the attached: **ICIB INVESTMENTS INC'S MOTION TO MODIFY THE AUTOMATIC STAY AS TO 6349 S. DREXEL AVENUE, CHICAGO, ILLINOIS 60637 REGARDING PIN 20-23-104-012-0000**

BY:/s/Paul M. Bach
Paul M. Bach
BACH LAW OFFICES
P.O. Box 1285
Northbrook, Illinois 60062
847 564 0808

PROOF OF SERVICE

I, PAUL M. BACH certify that I served this notice and attached motion upon all parties named in this notice as stated on the attached service list by the method stated and if by first class US Mail with proper postage prepaid, in Northbrook, IL 60062 all on April 18, 2019.

/s/Paul M. Bach

SERVICE LIST

Roosevelt Morgan

6349 S. Drexel Avenue, 1st Floor
Cicero, IL 60637

BY FIRST CLASS US MAIL

Michael Oreluk

4043 N. Ravenswood Avenue
Suite 208
Chicago, Illinois 60613

BY ECF ELECTRONIC DELIVERY

Marilyn O. Marshall

224 South Michigan Suite 800
Chicago, IL 60604

BY ECF ELECTRONIC DELIVERY

Patrick S Layng

Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604

BY ECF ELECTRONIC DELIVERY

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IN RE:)	Chapter 13
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**ICIB INVESTMENTS INC'S MOTION TO MODIFY THE AUTOMATIC STAY AS TO 6349 S.
DREXEL AVENUE, CHICAGO, ILLINOIS 60637 REGARDING PIN 20-23-104-012-0000**

NOW COMES, ICIB Investments, Inc., by its attorney, Paul M. Bach of Bach Law Offices and pursuant to 11 USC 362(d) and in support of its Motion to Modify the Automatic Stay as to 6349 S. Drexel Avenue, Chicago, Illinois 60637 regarding PIN 20-23-104-012-0000 states as follows:

1. This case is currently pending before this court as a result of a voluntary petition for relief filed by the Debtor under Chapter 13 of the United States Bankruptcy Code on October 24, 2018.
2. The Debtor listed on Schedule A of his Bankruptcy Schedules an ownership interest in the real estate commonly known as 6349 S. Drexel Avenue, Chicago, Illinois 60637 regarding PIN 20-23-104-012-0000 ("the real estate").
3. On June 6, 2016, ICIB Investments, Inc. purchased the 2014 General Real Estate Taxes for PIN 20-23-104-012-0000 and paid a total of \$515.27. *See* Certificate of Purchase attached to Petition for Tax Deed as an Exhibit to this Motion.
4. Since the purchase of the 2014 General Real Estate Taxes, ICIB Investments, Inc. or its predecessors in interest has paid the subsequent General Real Estate Taxes and incurred costs totaling \$15,512.60.

5. ICIB Investments, Inc. has previously filed a Petition for Tax Deed in the Circuit Court of Cook County, County Division which was given case number 2018 COTD 03682.
6. The statutory right of redemption in this case expired on December 12, 2018.
7. The first installment of 2018 real estate taxes due on March 1, 2019 in the amount of \$1,748.97 has not been paid.
8. Another installment of real estate taxes (Second Installment of 2018) comes due on July 1, 2019 of at least \$1,338.35. This amount could be larger based on a variety of factors.
9. ICIB Investments, Inc. or its predecessors in interest does not have proof that the real property is insured.
10. Pursuant to 11 U.S.C. Section 362 ...
 - (d) On request of a party in interest and after notice and hearing, the court shall grant relief from the stay provided under subsection (a) of this section, such as by terminating, annulling, modifying, or conditioning such stay—
 - (1) For cause, including the lack of adequate protection of an interest in property of such party in interest; or
 - (2) With respect to a stay, of an act against property under subsection (a) of this section, if—
 - (A) the Debtor does not have an equity in such property; and
 - (B) such property is not necessary to an effective reorganization.
11. That the creditor requests and the Court should order that the fourteen day stay provided for by Bankruptcy Rule 4001(a)(3) should not apply as to Creditor.

WHEREFORE, ICIB Investments, Inc., asks this Honorable Court to enter an order modifying the automatic stay as to permit, ICIB Investments, Inc. and/or its successors in interest to proceed pursuant to non-bankruptcy law as to regarding regarding PIN 20-23-104-

012-0000 and find that Bankruptcy Rule 4001(a)(3) is not applicable and further relief as is just and equitable.

Respectfully Submitted,

ICIB Investments, Inc.
BY:/s/Paul M. Bach

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P.O. Box 1285
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